

April 27, 2017

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Notice of Oral Ex Parte Presentation**
*ET Docket No. 13-49, Revision of Part 15 of the Commission's Rules to Permit
Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz
Band*

Dear Ms. Dortch:

On April 25, 2017, Chris Szymanski, Director, Product Marketing and Government Affairs, Broadcom Corporation ("Broadcom"), and the undersigned counsel met separately with Daudeline Meme, legal advisor to Commissioner Clyburn, and Erin McGrath, legal advisor to Commissioner O'Rielly.

In each case, we discussed, among other matters, the above-referenced proceeding. We noted that Broadcom continues to be a strong proponent of the rechannelization plan for the 5850-5925 MHz band (the "5.9 GHz band"), which will establish three dedicated 10 megahertz channels for dedicated short range communication ("DSRC") latency-sensitive safety applications while designating 45 megahertz of shared spectrum for unlicensed operations and other DSRC applications in the 5850-5895 MHz portion of the 5.9 GHz band.

We explained that:

- Broadcom has provided the Office of Engineering and Technology ("OET") with DSRC and Wi-Fi prototype equipment to enable OET to test co-channel operation of DSRC and Wi-Fi devices;^{1/}
- Broadcom's Wi-Fi prototypes effectively shared 20 megahertz channels with DSRC traffic and allowed the FCC to observe a variety of sharing parameters;
- OET was in the process of understanding the functionality of the prototypes and configuring its test bed to conduct testing of co-channel operation; and

^{1/} See *Office of Engineering and Technology Announces Schedule for Testing Prototype U-NII-4 Devices*, Public Notice, ET Docket No. 13-49, DA 16-1054 (rel. Oct. 7, 2016).

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

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- Broadcom's own testing of its prototypes clearly demonstrates that significant benefits will be derived from use of a shared portion of the 5.9 GHz band by unlicensed devices.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this letter has been electronically submitted in the record of this proceeding and sent via e-mail to each member of the Commission's staff with whom we met.

Respectfully submitted,

/s/ Russell H. Fox

Russell H. Fox

cc: Daudeline Meme
Erin McGrath